

April 17, 2017

U.S. Environmental Protection Agency
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Attn: Mr. Tony Kish

**RE: R310 Application for a Chlorothalonil Technical Product Using Currently Registered Sources
53883-NEW CSI Chlorothalonil Technical NC**

Dear Mr. Kish,

Control Solutions, Inc. wishes to apply for a new technical registration of chlorothalonil. This product is substantially similar in labeling and identical in composition to 83558-19. In support of this application, included please find:

Administrative Materials

- Application for Pesticide Registration (EPA Form 8570-1)
- Confidential Statement of Formula – Basic and Alternate #1 (EPA Form 8570-4)
- Certification with Respect to Citation of Data (EPA Form 8570-34)
- Data Matrix (EPA Form 8570-35), Public and Agency Versions
- Proposed Label for CSI Chlorothalonil Technical NC
- Copy of the PRIA Payment Receipt for an R310 Application
- Letter of Authorization from ADAMA Celsius Property B.V. (EPA Company No. 83558)



Control Solutions, Inc. is using the straight selective method of data citation. As per EPA's interpretations of 40 CFR Parts 152.93(b)(2)(i), Control Solutions, Inc. submitted notices of intent to apply and offer to pay to the extent required by FIFRA § 3(c)(1)(F). This action falls under PRIA category R310 (46: New end-use or manufacturing-use product with registered source(s) of active ingredient(s); selective data citation). The fee for this action is \$5,301 and has been paid.

Please feel free to contact me by email at leanna.bosarge@controlsolutionsinc.com or by phone at 281-892-2512 should you have any questions regarding this submission or need any additional information.

Sincerely,



Leanna Bosarge
Director, Regulatory Affairs

 United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number 53883-XXX		2. EPA Product Manager Tony Kish	
4. Company/ Product (Name) CSI Chlorothalonil Technical NC		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: EPA Reg. No.: 83558-19 Product Name: Chlorothalonil Technical	
Section – II			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Other – Explain below.	
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) New registration application for a chlorothalonil technical product utilizing previously approved sources with selective citation of data.			
Section – III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____
*Certification must be submitted	If "Yes" Unit Packaging Wt.	No. Per Container	If "Yes" Packaging Wt.
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 2000 lbs		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other			
Section – IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).			
Name Leanna Bosarge		Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (281) 892-2512
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Director, Regulatory Affairs	
4. Typed Name Leanna Bosarge		5. Date April 17, 2017	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Control Solutions, Inc., 5903 Genoa Red Bluff, Pasadena, TX 77507	EPA Registration Number/File Symbol 53883-XXX
Active Ingredient(s) and/or representative test compound(s) Chlorothalonil	Date April 17, 2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Non-Food, Greenhouse non-food, Residential Outdoor, Residential Indoor	Product Name CSI Chlorothalonil Technical NC

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date April 17, 2017	Typed or Printed Name and Title Leanna Bosarge - Director, Regulatory Affairs
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DATA MATRIX

Date April 17, 2017	EPA Reg. No./File Symbol 53883-XXX	Page 1 of 18
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product CSI Chlorothalonil Technical NC	
Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Celsius Property B.V.	PERM	
			Celsius Property B.V.	PERM	
			Celsius Property B.V.	PERM	
					Not Required ¹
			Celsius Property B.V.	PERM	

Signature <i>Leanna Bosarge</i>	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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Signature <i>Leanna Bosarge</i>	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Celsius Property B.V.	PERM	
			Syngenta Crop Protection	OLD PERM	See endnote ²
				OLD OLD	See endnote ³
			Syngenta Crop Protection	PAY	See endnote ⁴
			Oxon Italia S.p.a.	PAY	See endnote ⁵
					Not required
			Oxon Italia S.p.a.	PAY	See endnote ⁶
			Oxon Italia S.p.a.	PAY	See endnote ⁷
			Syngenta Crop Protection	OLD PERM	See endnote ⁸
				OLD	See endnote ⁹
			Oxon Italia S.p.a.	PAY	See endnote ¹⁰
			Syngenta Crop Protection	PERM	See endnote ¹¹
			Syngenta Crop Protection	PERM	See endnote ¹²
			Syngenta Crop Protection	PERM	See endnote ¹³
				OLD	See endnote ¹⁴
			Oxon Italia S.p.a.	OLD PAY	See endnote ¹⁵

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Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Not required
			Syngenta Crop Protection	PERM	See endnote ¹⁶
			Syngenta Crop Protection	PERM	See endnote ¹⁷
			Sipcam Agro Usa, Inc. IBC Manufacturing Co.	PAY PAY	See endnote ¹⁸
			GB Biosciences, LLC	PAY	See endnote ¹⁹
				OLD	See endnote ²⁰
					Not required
					Not required
					Not required
			Syngenta Crop Protection	PERM	See endnote ²¹
				OLD OLD OLD OLD OLD	See endnote ²²
				OLD	See endnote ²³
				OLD OLD	See endnote ²⁴
				OLD	See endnote ²⁵

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Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Syngenta Crop Protection	PERM	See endnote ²⁶
			Syngenta Crop Protection	PAY	Not required
					Not required
				OLD	See endnote ²⁷
				OLD	See endnote ²⁸
				OLD	
				OLD	
				OLD	See endnote ²⁹
				OLD	See endnote ³⁰
					Not required
				OLD	See endnote ³¹
				OLD	
				OLD	
				OLD	
				OLD	
				OLD	
				OLD	

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				OLD	See endnote ³²
			IBC Manufacturing Co.	PERM	See endnote ³³
				OLD OLD	See endnote ³⁴
			Agricultural Handlers Exposure Task Force	PAY	
					Not required
			Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection	PERM PERM PERM	See endnote ³⁵
			Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection	PERM PERM PERM	See endnote ³⁶
			Agricultural Handlers Exposure Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
				OLD OLD OLD OLD OLD	See endnote ³⁷

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				OLD OLD OLD OLD OLD	See endnote ³⁸
				GAP	See endnote ³⁹
			Agricultural Re-entry Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Agricultural Re-entry Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Agricultural Re-entry Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Agricultural Re-entry Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	

Signature <i>Leanna Bosarge</i>	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agricultural Handlers Exposure Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
			Outdoor Residential Exposure Task Force	PAY	
			Syngenta Crop Protection	PERM	See endnote ⁴⁰
			Syngenta Crop Protection	PERM	See endnote ⁴¹
			Syngenta Crop Protection	OLD PERM	See endnote ⁴²
			Syngenta Crop Protection	OLD PERM	See endnote ⁴³
				OLD	See endnote ⁴⁴
				OLD OLD OLD OLD	See endnote ⁴⁵
					Not required
					Not required
					Not required

Signature <i>Leanna Bosarge</i>	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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			Makhteshim Agan of N.A.	PERM	See endnote ⁴⁷
			Makhteshim Agan of N.A.	PERM	See endnote ⁴⁷
				GAP	See endnote ⁴⁸
			Chlorothalonil Antimicrobial Testing Task Force	PAY	See endnote ⁴⁹
				OLD	See endnote ⁵⁰
			Syngenta Crop Protection	PERM	See endnote ⁵¹
			Syngenta Crop Protection	PERM	See endnote ⁵¹
				GAP	See endnote ⁵²
				OLD	See endnote ⁵³
				OLD	See endnote ⁵³
			Sipcam Agro USA, Inc.	PAY	See endnote ⁵⁴
			Chlorothalonil Antimicrobial Testing Task Force	PAY	See endnote ⁵⁴
				GAP	See endnote ⁵⁵
				GAP	See endnote ⁵⁶
				GAP	See endnote ⁵⁷

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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DATA MATRIX

Date April 17, 2017	EPA Reg. No./File Symbol 53883-XXX	Page 12 of 18
Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product CSI Chlorothalonil Technical NC	
Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Syngenta Crop Protection	OLD	See endnote ⁵⁸
			Syngenta Crop Protection	OLD	
			Syngenta Crop Protection	OLD	
			Syngenta Crop Protection	PAY	
			Syngenta Crop Protection	PAY	See endnote ⁵⁹
			Syngenta Crop Protection	PAY	
			Oxon Italia S.p.a.	OLD	See endnote ⁶⁰
			Syngenta Crop Protection	PAY	
			Syngenta Crop Protection	PAY	See endnote ⁶¹
			Syngenta Crop Protection	PAY	
			Syngenta Crop Protection	OLD	See endnote ⁶²
			Syngenta Crop Protection	PERM	
			Syngenta Crop Protection	PERM	
			Syngenta Crop Protection	PERM	
					Not required
			Syngenta Crop Protection	PAY	See endnote ⁶³
			Syngenta Crop Protection	OLD	See endnote ⁶⁴
				OLD	
				OLD	
				OLD	
				PAY	

Signature <i>Leanna Bosarge</i>	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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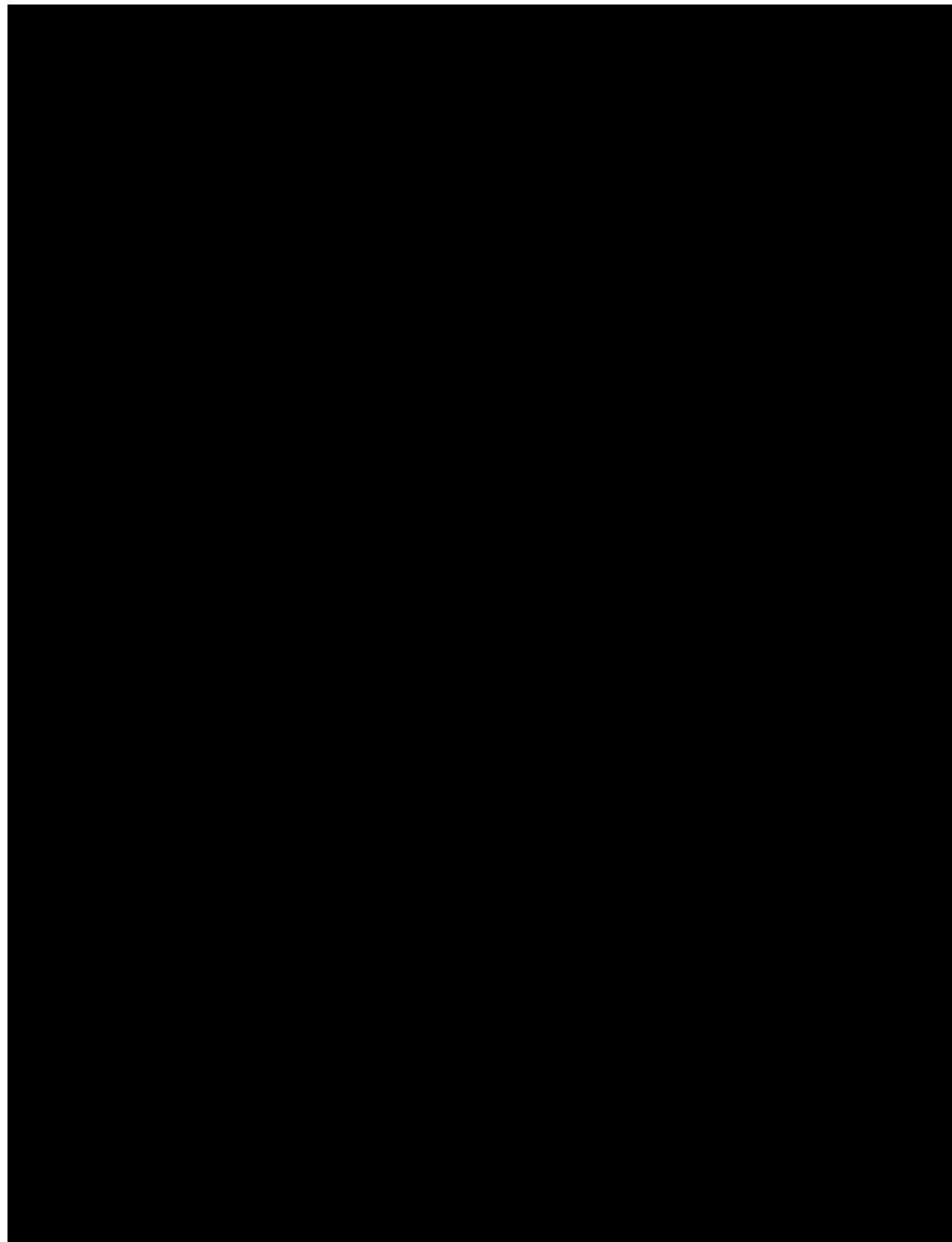
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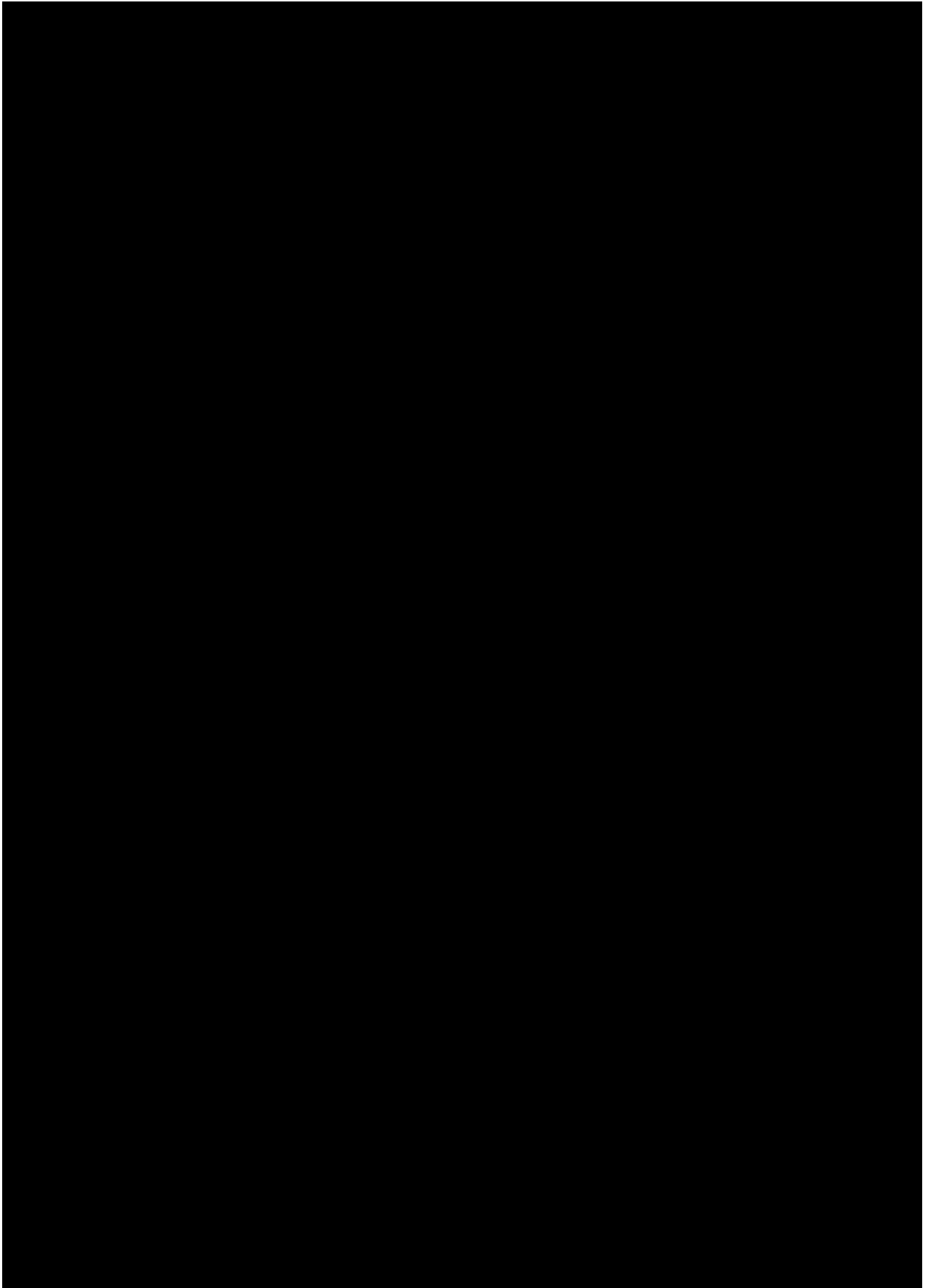
DATA MATRIX

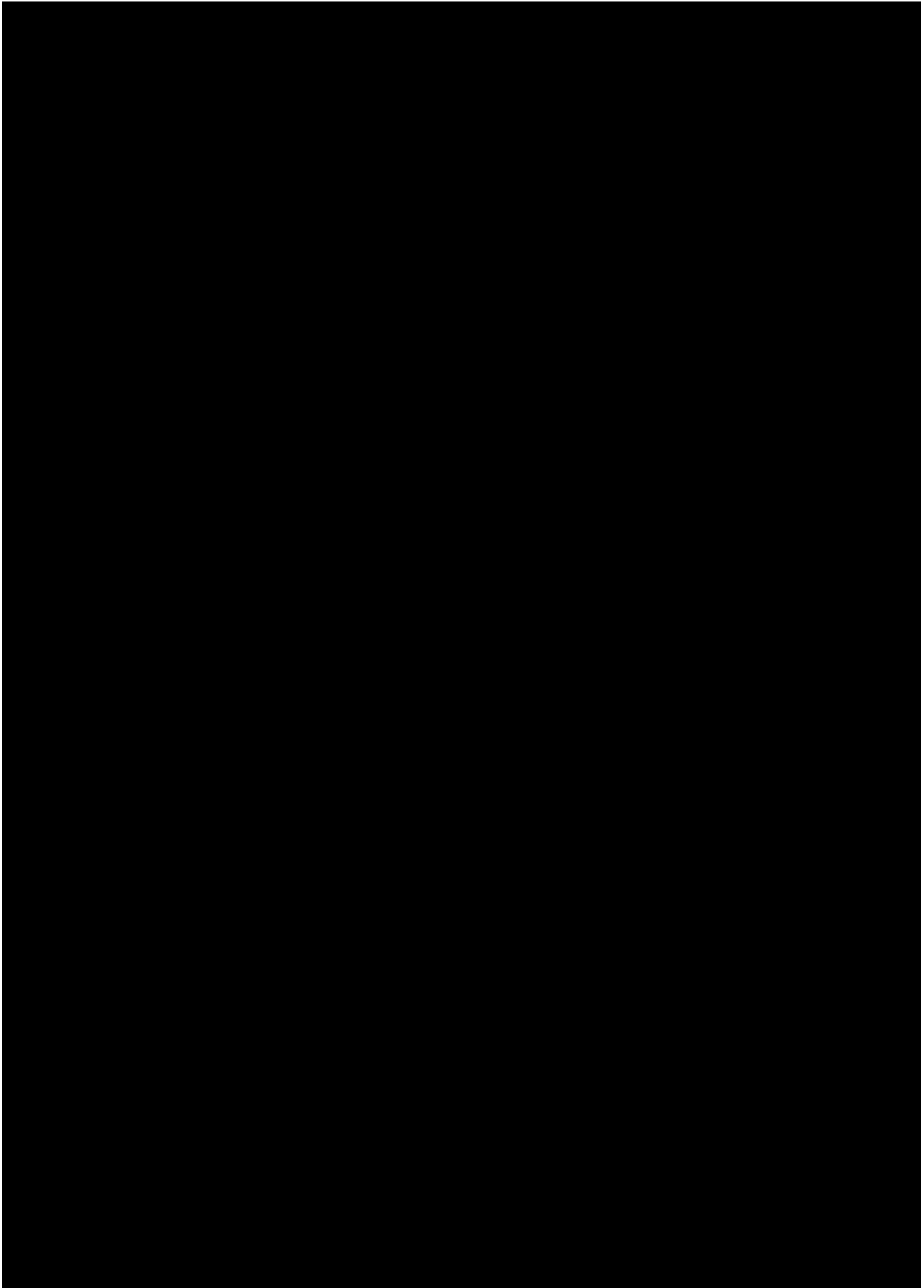
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Ingredient Chlorothalonil (CAS No.1897-45-6)		

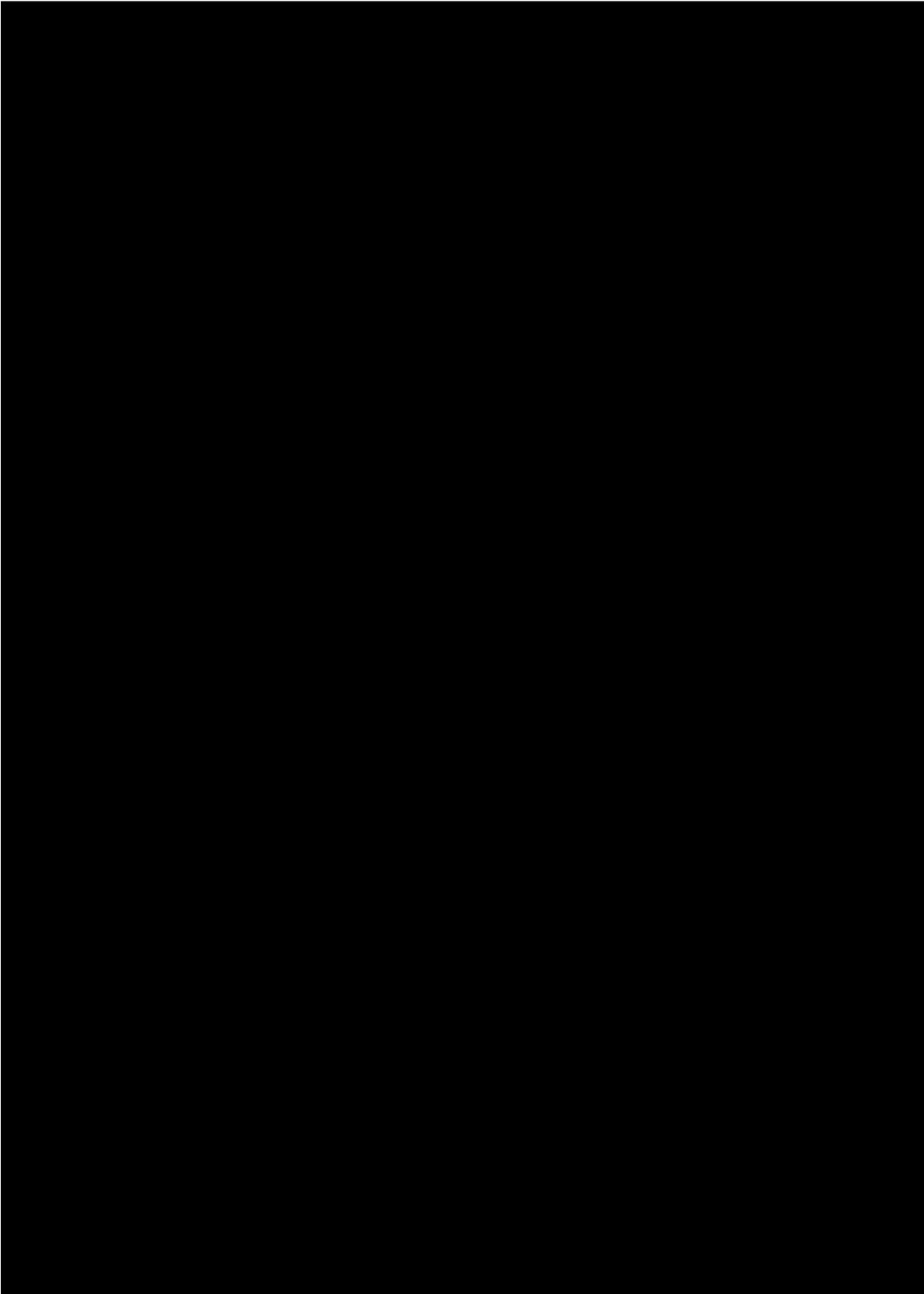
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				OLD	See endnote ⁶⁵
					Not required
			Syngenta Crop Protection	PERM	See endnote ⁶⁶
			Syngenta Crop Protection	PERM	See endnote ⁶⁶
			Syngenta Crop Protection	PERM	See endnote ⁶⁶
			IBC Manufacturing Co.	PERM	See endnote ⁶⁶
			Syngenta Crop Protection	PERM	See endnote ⁶⁶
			Syngenta Crop Protection	PERM	See endnote ⁶⁶
			Syngenta Crop Protection	PERM	See endnote ⁶⁶
			Syngenta Crop Protection	PERM	See endnote ⁶⁶
			Syngenta Crop Protection	PERM	See endnote ⁶⁶

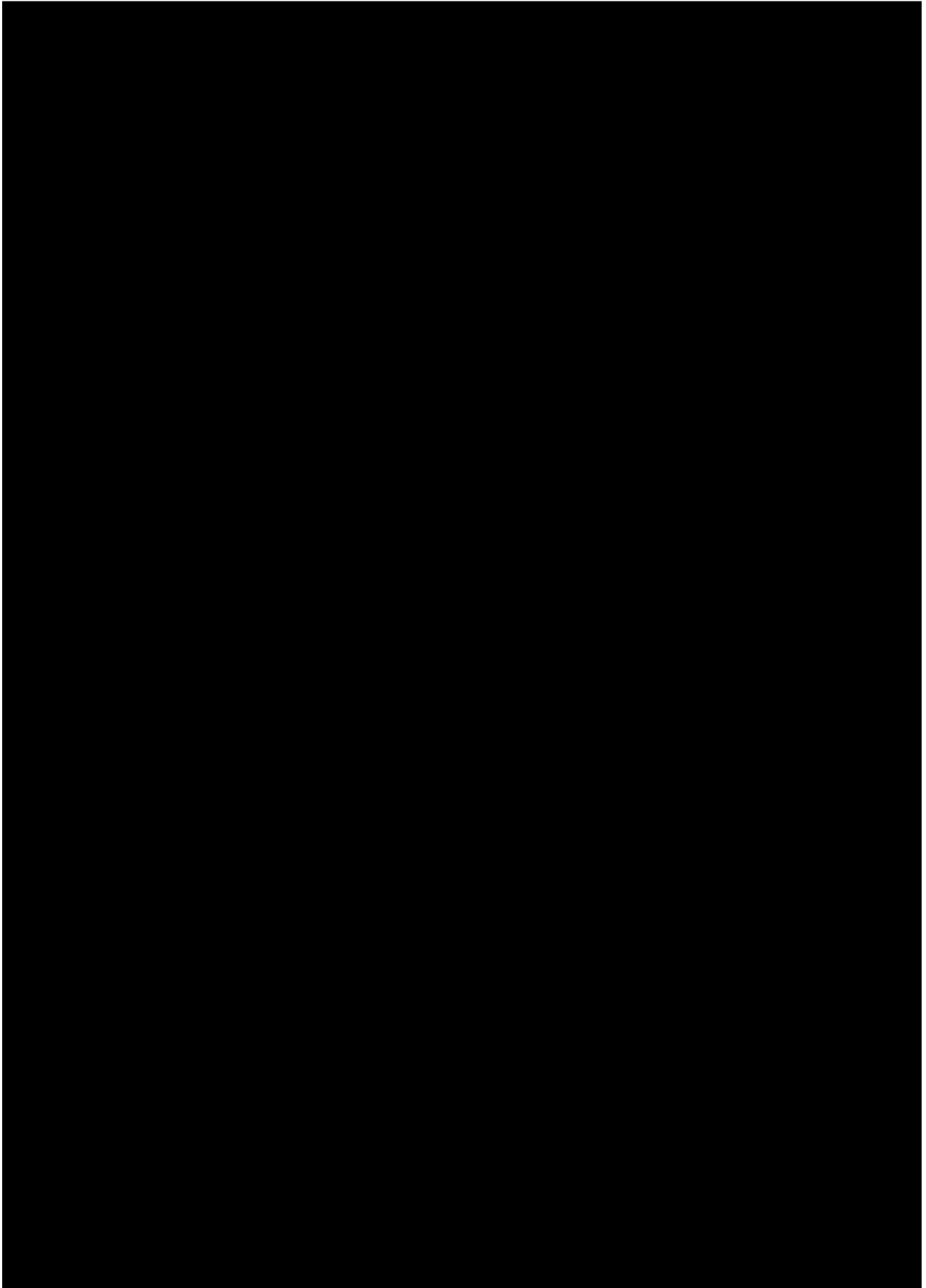
Signature <i>Leanna Bosarge</i>	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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CSI Chlorothalonil Technical NC

For Manufacturing Use Only

ACTIVE INGREDIENT:

Chlorothalonil: (tetrachloroisophthalonitrile)..... 98.0%

OTHER INGREDIENTS: 2.0%

TOTAL: 100.00%



ADAMA

Consumer &
Professional
Solutions

Manufactured for:
Control Solutions, Inc.
5903 Genoa Red Bluff
Pasadena, TX 77507

EPA Reg. No: 53883-XXX

EPA Est. No: _____

Net Contents: _____

KEEP OUT OF REACH OF CHILDREN

DANGER-PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.	
NOTE TO PHYSICIAN: This product may cause temporary allergic side effects characterized by redness or rash on exposed skin areas. Treat with antihistamines or steroid creams and/or systemic steroids. If swallowed, probable mucosal damage may contraindicate the use of gastric lavage.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes severe eye damage. May be fatal if inhaled; do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. CSI Chlorothalonil Technical NC may produce temporary allergic side effects characterized by redness of the eyes, mild bronchial irritation, and redness or rash on exposed skin areas. Persons having allergic reaction should

contact a physician. Do not get in eyes or on clothing. Harmful if swallowed or absorbed through the skin. Wear any NIOSH-approved respirator with an N, R, P, or HE filter. Wear goggles or a face shield, chemical-resistant gloves such as nitrile, butyl rubber or natural rubber, long-sleeved shirt and long pants when handling this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

FOR FORMULATION PURPOSES ONLY: This product is intended for use only by formulators in preparing endues fungicides/mildewcides.

When manufacturing wettable powder formulations: This product may only be used to manufacture wettable powder formulations that 1} are packaged in water-soluble packets, the outside of which contains a pictogram depicting that users should not cut, rip, or tear; or 2} bear the labeling "For use in closed mixing/loading systems only."

Do not formulate into products labeled for use on home lawns and turf sites associated with apartment buildings, daycare centers, playgrounds, playfields, recreational park athletic fields, athletic fields located on or next to schools (i.e., elementary, middle, and high schools), campgrounds, churches, and theme parks.

Do not use for formulating into products intended for sod farm uses at application rates greater than 13 pounds of active ingredient per acre per year.

This product may be formulated into end-use fungicides/mildewcides having the following use sites:

1. **Ornamental plants:** A wide range of ornamental plant species grown in field, nursery, and greenhouses.
2. **Turf:** Grasses grown on sod farms, golf courses (tees, fairways, greens), grasses grown for seed.
3. **Tree Crops (Non-food only):** Conifers, pine and spruce in forest stands, Christmas tree plantations, and nurseries.
4. Additive for aqueous-based and solvent-based paints, stains, coatings, adhesives, caulks, sealants, grouts, joint compounds, composite wood products, wood preservative stains, and wood treatment fungicides for control of mold and decay in lumber and timber. Product incorporation into coatings and adhesives used for indirect food contact require approval from FDA via a food additive petition.
5. This product must not be formulated into a product intended as a mildewcidal paint additive for direct sale to retail customers, e.g. in a "pillow pack" or other small volume or one-use package.
6. This product must not be used to formulate products for use as in-container preservatives.
7. This product may only be formulated into mildewcidal paint additive products that are labeled as follows: The product may only be added to paint products that are labeled A) with product-specific instructions for the use of a respirator during applications, or B) as follows: "When applying with a sprayer, wear a dust/mist filtering respirator (MSHA/NIOSH approval number TC-21 C) or a NIOSH-approved respirator with any R, P, or HE filter." If oil is not present in the paint product or recommended for use as an additive in the paint product, add "N" as an additional respirator type.

8. **Other Uses:** Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration excluding any use strictly prohibited by this label. Uses for experimental purposes that are in compliance with the US EPA's requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a dry area. Protect from excessive heat.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty container into formulation equipment. Then dispose of empty container in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available.

WARRANTY STATEMENT

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Control Solutions, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Control Solutions, Inc. and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, IT IS **CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT** in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

To the extent consistent with applicable law, Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.



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Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product CSI Chlorothalonil Technical NC	
Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	44855901 44993201 45049101 45238801 45608201 49876801 50141701	Celsius Property B.V.	PERM	
830.1600	Description of Materials Used to Produce the Product	44855901 44993201 45049101 45238801 45608201 49876801 50141701	Celsius Property B.V.	PERM	
830.1620	Description of Production Process	44855901 44993201 45049101 45238801 45608201 49876801 50141701	Celsius Property B.V.	PERM	
830.1650	Description of Formulation Process				Not Required ¹
830.1670	Discussion of Formation of Impurities	44855901 44993201 45049101 45238801 45608201 49876801 50141701	Celsius Property B.V.	PERM	

Signature 	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1700	Preliminary Analysis	44879601 44879602 45006201 45006202 45238801 49876802	Celsius Property B.V.	PERM	
830.1750	Certified Limits	44879601 44879602 44993201 45049101 45238801 45608201 49876801 50141701	Celsius Property B.V.	PERM	
830.1800	Enforcement Analytical Method	44879601 44879602 45049102 45238801 49876801 49876802 50141703	Celsius Property B.V.	PERM	
830.6302	Color	44993201 45049101 45238801 45608201	Celsius Property B.V.	PERM	
830.6303	Physical State	44993201 45049101 45238801 45608201	Celsius Property B.V.	PERM	

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Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6304	Odor	45238801	Celsius Property B.V.	PERM	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	45238801	Celsius Property B.V.	PERM	
830.6314	Oxidation/Reduction: Chemical Incompatibility	44993201 45049101 45238801 45608201	Celsius Property B.V.	PERM	
830.6315	Flammability	45238801	Celsius Property B.V.	PERM	
830.6316	Explosibility	45238801	Celsius Property B.V.	PERM	
830.6317	Storage Stability	45238801 45608201 46245301	Celsius Property B.V.	PERM	
830.6319	Miscibility	45238801	Celsius Property B.V.	PERM	
830.6320	Corrosion Characteristics	45238801 45608201 46245301	Celsius Property B.V.	PERM	
830.6321	Dielectric Breakdown Voltage	45238801	Celsius Property B.V.	PERM	
830.7000	pH	44993201 45049101 45238801 45608201	Celsius Property B.V.	PERM	
830.7050	UV/Visible Absorption	45238801	Celsius Property B.V.	PERM	
830.7100	Viscosity	44993201 45238801 45608201	Celsius Property B.V.	PERM	

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Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7200	Melting Point/Melting Range	45238801	Celsius Property B.V.	PERM	
830.7220	Boiling Point/Boiling Range	45238801	Celsius Property B.V.	PERM	
830.7300	Density/Relative Density/Bulk Density	44993201 45049101 45608201 45238801	Celsius Property B.V.	PERM	
830.7370	Dissociation Constants in Water	45238801	Celsius Property B.V.	PERM	
830.7520	Particle Size, Fiber Length, and Diameter Distribution	45238801	Celsius Property B.V.	PERM	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	45238801	Celsius Property B.V.	PERM	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method	45238801	Celsius Property B.V.	PERM	
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography	45238801	Celsius Property B.V.	PERM	
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	45238801	Celsius Property B.V.	PERM	
830.7860	Water Solubility, Generator Column Method	45238801	Celsius Property B.V.	PERM	
830.7950	Vapor Pressure	45238801	Celsius Property B.V.	PERM	
870.1100	Acute Oral Toxicity: Rat	44993203	Celsius Property B.V.	PERM	
870.1200	Acute Dermal Toxicity: Rat	44993204	Celsius Property B.V.	PERM	
870.1300	Acute Inhalation Toxicity: Rat	44993205	Celsius Property B.V.	PERM	
870.2400	Primary Eye Irritation: Rabbit	44993206	Celsius Property B.V.	PERM	
870.2500	Primary Dermal Irritation: Rabbit	44993207	Celsius Property B.V.	PERM	

Signature <i>Leanna Bosarge</i>	Name and Title Leanna Bosarge, Dir. Regulatory Affairs	Date April 17, 2017
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.2600	Dermal Sensitization	44993208	Celsius Property B.V.	PERM	
850.2100	Acute Avian Oral Toxicity	00068753 49342710	Syngenta Crop Protection	OLD PERM	See endnote ²
850.2200	Acute Avian Dietary Toxicity	00030388 00039146		OLD OLD	See endnote ³
SS-1075	Avian Acute Inhalation	49529101	Syngenta Crop Protection	PAY	See endnote ⁴
850.2400	Wild Mammal Toxicity				
850.2300	Avian Reproductive Toxicity	45710218	Oxon Italia S.p.a.	PAY	See endnote ⁵
850.2500	Simulated or Actual Field Testing				Not required
850.1075	Freshwater Fish Toxicity	45710219	Oxon Italia S.p.a.	PAY	See endnote ⁶
850.1010	Freshwater Invertebrate Toxicity	45710221	Oxon Italia S.p.a.	PAY	See endnote ⁷
850.1075	Estuarine/Marine Fish Toxicity	00127863 49342707	Syngenta Crop Protection	OLD PERM	See endnote ⁸
850.1025, 850.1035, 850.1045, 850.1055	Acute Toxicity Estuarine and Marine Organisms	00138143		OLD	See endnote ⁹
850.1300	Aquatic Invertebrate Life Cycle (Freshwater)	45710222	Oxon Italia S.p.a.	PAY	See endnote ¹⁰
850.1350	Aquatic Invertebrate Life Cycle (Saltwater)	49524601	Syngenta Crop Protection	PERM	See endnote ¹¹
850.1400	Fish Early Life Stage (Freshwater)	49342708	Syngenta Crop Protection	PERM	See endnote ¹²
850.1400	Fish Early Life Stage (Saltwater)	49342708	Syngenta Crop Protection	PERM	See endnote ¹³
850.1500	Life Cycle Fish	00030391		OLD	See endnote ¹⁴
850.1710, 850.1730, 850.1850	Aquatic Organisms Bioavailability, Biomagnification, Toxicity	43070601 45710224	Oxon Italia S.p.a.	OLD PAY	See endnote ¹⁵

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Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1950	Simulated or Actual Field Testing for Aquatic Organisms				Not required
850.1735	Whole sediment: Acute Freshwater Invertebrates	49342709 49524602	Syngenta Crop Protection	PERM	See endnote ¹⁶
850.1740	Whole sediment: Acute Marine Invertebrates	49524603	Syngenta Crop Protection	PERM	See endnote ¹⁷
SS-1172	Wood Leaching Study (AWPA E11-06)	49158101 49593601	Sipcam Agro Usa, Inc. IBC Manufacturing Co.	PAY PAY	See endnote ¹⁸
850.1950	Simulated or Actual Field Testing for Aquatic Organisms	46047304	GB Biosciences, LLC	PAY	See endnote ¹⁹
850.3020	Honey Bee Acute Contact Toxicity	00077759		OLD	See endnote ²⁰
850.3030	Honey Bee Toxicity of Residues on Foliage				Not required
850.3040	Semi-Field Test for Pollinators				Not required
870.6100	Delayed Neurotoxicity (Acute) – Rat				Not required
870.6200	Acute Neurotoxicity – Rat	49342714 49342715	Syngenta Crop Protection	PERM	See endnote ²¹
870.3100	90-Day Oral: Rodent	00138148 00258769 00127852 00258768 00127850		OLD OLD OLD OLD OLD	See endnote ²²
870.3150	90-Day Oral: Non-Rodent	43653602		OLD	See endnote ²³
870.3200	21/28 Day Dermal Toxicity	00158254 44119101		OLD OLD	See endnote ²⁴
870.3250	90-Day Dermal Toxicity	00112735		OLD	See endnote ²⁵

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Applicant's / Registrant's Name & Address Control Solutions Inc. 5903 Genoa Red Bluff Pasadena, TX 77507	Product CSI Chlorothalonil Technical NC	
Ingredient Chlorothalonil (CAS No.1897-45-6)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3465	90-Day Inhalation Toxicity	49184810 49247501	Syngenta Crop Protection Syngenta Crop Protection	PERM PAY	See endnote ²⁶
870.6100	28-Day Delayed Neurotoxicity Hen				Not required
870.6200	90-Day Neurotoxicity – Rat				Not required
870.4100	Chronic Toxicity – Non-Rodent	00114034 43653603		OLD OLD	See endnote ²⁷
870.4300	Combined Chronic Toxicity/Carcinogenicity	00030286 00127858 00146945 40243701 41250502		OLD OLD OLD OLD OLD	See endnote ²⁸
870.3700	Prenatal Developmental Toxicity Study	00130733 41250503		OLD OLD	See endnote ²⁹
870.3800	Reproduction and Fertility Effects	41706201		OLD	See endnote ³⁰
870.6300	Developmental Neurotoxicity Study				Not required
870.5100, 870.5300, 870.5375, 870.5385, 870.5395	Mutagenicity Testing	00030288 00030289 00030290 00030291 00127853 00127854 00147946 00147947 00147948 00147949 40559103 43700601 43700602		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	See endnote ³¹

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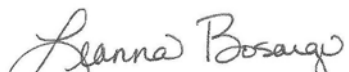
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.7600	Dermal Penetration	43600103		OLD	See endnote ³²
870.7800	Immunotoxicity	48796201	IBC Manufacturing Co.	PERM	See endnote ³³
870.7485	Metabolism and Pharmacokinetics	44223002 44240901		OLD OLD	See endnote ³⁴
875.1100	Dermal Exposure – Outdoor		Agricultural Handlers Exposure Task Force	PAY	
875.1200	Dermal Exposure – Indoor				Not required
875.1300	Inhalation Exposure – Outdoor	49184801 49184803 49184804	Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection	PERM PERM PERM	See endnote ³⁵
875.1400	Inhalation Exposure – Indoor	49184801 49184803 49184804	Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection	PERM PERM PERM	See endnote ³⁶
875.1500	Biological Monitoring		Agricultural Handlers Exposure Task Force	PAY	
875.1600	Data Reporting and Calculations		Agricultural Handlers Exposure Task Force	PAY	
875.1700	Product Use Information		Agricultural Handlers Exposure Task Force	PAY	
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues	00147976 42875902 42875903 42875904 43938401		OLD OLD OLD OLD OLD	See endnote ³⁷

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2200	Soil Residue Dissipation	00147976 42875902 42875903 42875904 43938401		OLD OLD OLD OLD OLD	See endnote ³⁸
875.2300	Indoor Surface Residue Dissipation			GAP	See endnote ³⁹
875.2400	Dermal Exposure		Agricultural Re-entry Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2500	Inhalation Exposure		Agricultural Re-entry Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2600	Biological Monitoring		Agricultural Re-entry Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2700	Product Use Information		Agricultural Re-entry Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.2800	Descriptions of Human Activity		Agricultural Re-entry Task Force Outdoor Residential Exposure Task Force	PAY PAY	

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2900	Data Reporting and Calculations		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
875.3000	Nondietary Ingestion Exposure		Agricultural Handlers Exposure Task Force Outdoor Residential Exposure Task Force	PAY PAY	
202-1	Droplet Size Spectrum	49184805	Syngenta Crop Protection	PERM	See endnote ⁴⁰
202-2	Droplet Size Spectrum	49184806	Syngenta Crop Protection	PERM	See endnote ⁴¹
850.4100	Tier I: Seedling Emergence	42433808 49342711	Syngenta Crop Protection	OLD PERM	See endnote ⁴²
850.4150	Tier I: Vegetative Vigor	42433809 49342712	Syngenta Crop Protection	OLD PERM	See endnote ⁴³
850.4400	Tier I: Aquatic Plant Growth – Vascular Plants	44908102		OLD	See endnote ⁴⁴
850.5400	Tier I: Aquatic Plant Growth - Algae	44908105 44908104 44908103 42432801		OLD OLD OLD OLD	See endnote ⁴⁵
850.4300	Terrestrial Field				Not required
850.4450	Aquatic Field				Not required
850.4025	Target Area Phytotoxicity				Not required
850.4550	Cyanobacteria Toxicity				Not required

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.3300	Modified Activated Sludge Respiration Inhibition Test	49527202	Sipcam Agro USA, Inc.	PAY	See endnote ⁴⁶
850.6100	Environmental Chemistry Methods	49659702 49659704	Makhteshim Agan of N.A. Makhteshim Agan of N.A.	PERM PERM	See endnote ⁴⁷
850.6800	Modified Activated Sludge Respiration Inhibition			GAP	See endnote ⁴⁸
835.1110	Activated Sludge, Sorption, Isotherm	49544401	Chlorothalonil Antimicrobial Testing Task Force	PAY	See endnote ⁴⁹
835.2120	Hydrolysis	00040539 49342701	Syngenta Crop Protection	OLD PERM	See endnote ⁵⁰
835.2240	Photodegradation in water	49342702	Syngenta Crop Protection	PERM	See endnote ⁵¹
835.2370	Photodegradation in air			GAP	See endnote ⁵²
835.2410	Photodegradation in soil	00087349 00040543		OLD OLD	See endnote ⁵³
835.3110	Ready Biodegradability	49527201 49697301	Sipcam Agro USA, Inc. Chlorothalonil Antimicrobial Testing Task Force	PAY PAY	See endnote ⁵⁴
835.3220	Porous Pot Test			GAP	See endnote ⁵⁵
835.3240	Simulation Tests – Aerobic Sewage Treatment-Activated Sludge			GAP	See endnote ⁵⁶
835.3280	Simulation Tests to Assess the Biodegradability of Chemicals			GAP	See endnote ⁵⁷

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.4100	Aerobic Soil Metabolism	00087357 00040547 43879601 47207702 47207703 49592601 49592602	Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection	OLD OLD OLD PAY PAY PAY PAY	See endnote ⁵⁸
835.4200	Anaerobic Soil Metabolism	49592603	Syngenta Crop Protection	PAY	See endnote ⁵⁹
835.4300	Aerobic Aquatic Metabolism	42226101 45908001 47207707 49592604	Oxon Italia S.p.a. Syngenta Crop Protection Syngenta Crop Protection	OLD PAY PAY PAY	See endnote ⁶⁰
835.4400	Anaerobic Aquatic Metabolism	00147975 49592604	Syngenta Crop Protection	OLD PAY	See endnote ⁶¹
835.1230, 835.1240	Leaching/Adsorption/Desorption	00029406 49342703 49342704 49342705 49342706	Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection Syngenta Crop Protection	OLD PERM PERM PERM PERM	See endnote ⁶²
835.1410	Volatility – Laboratory				Not required
835.8100	Volatility – Field	49992901	Syngenta Crop Protection	PAY	See endnote ⁶³
835.6100	Soil Field Dissipation Study	00071627 00087369 00087332 00087301 00071625 49992901	Syngenta Crop Protection	OLD OLD OLD OLD OLD PAY	See endnote ⁶⁴

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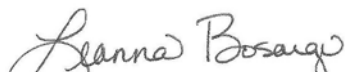
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.6200	Aquatic Sediment Field Dissipation Study	127861		OLD	See endnote ⁶⁵
860 Series	Residue Data				Not required
890.1100	Amphibian Metamorphosis (Frog)	49002801 49226001	Syngenta Crop Protection Syngenta Crop Protection	PERM PERM	See endnote ⁶⁶
890.1150	Androgen Receptor Binding (Rat Prostrate Cystol)	48676301	Syngenta Crop Protection	PERM	See endnote ⁶⁶
890.1350	Fish Short-term Reproduction	48950801	IBC Manufacturing Co.	PERM	See endnote ⁶⁶
890.1400	Hershberger (Rat)	48669902	Syngenta Crop Protection	PERM	See endnote ⁶⁶
890.1450	Female Pubertal (Rat)	48699301	Syngenta Crop Protection	PERM	See endnote ⁶⁶
890.1500	Male Pubertal (Rat)	48699302	Syngenta Crop Protection	PERM	See endnote ⁶⁶
890.1550	Steroidogenesis (Human Cell Line – H295R)	48669903	Syngenta Crop Protection	PERM	See endnote ⁶⁶
890.1600	Uterotrophic (Rat)	48669904	Syngenta Crop Protection	PERM	See endnote ⁶⁶

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Endnotes for Data Matrix for CSI Chlorothalonil Technical NC

- ¹ **830.1650 – Description of Formulation Process:** These data are not required for the registration of a manufacturing use product. See 830.1620 for production process information.
- ² **850.2100 – Acute Avian Oral Toxicity:** The study cited (MRID 00068753) was classified as acceptable and partially satisfies the data requirement per the Problem Formulation. MRID 49342710 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ³ **850.2200 – Acute Avian Dietary Toxicity:** The studies cited were classified as acceptable and satisfy the data requirement as per the Problem Formulation.
- ⁴ **SS-1075 – Avian Acute Inhalation:** This study was required under the Registration Review Generic DCI.
- ⁵ **850.2300 – Avian Reproductive Toxicity:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ⁶ **850.1075 – Freshwater Fish Toxicity:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ⁷ **850.1010 – Freshwater Invertebrate Toxicity:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ⁸ **850.1075 – Estuarine/Marine Fish Toxicity:** The study cited was classified as supplemental and partially satisfies the requirement per the Problem Formulation. MRID 49342707 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ⁹ **850.1025, 850.1035, 850.1045, 850.1055 – Acute Toxicity Estuarine and Marine Organisms:** The study cited was classified as acceptable and satisfies the data requirement as per the Problem Formulation.
- ¹⁰ **850.1300 - Aquatic Invertebrate Life Cycle (Freshwater):** The study cited is classified as supplemental and satisfies the requirement per the Problem Formulation.
- ¹¹ **850.1350 - Aquatic Invertebrate Life Cycle (Saltwater):** MRID 49524601 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ¹² **850.1400 – Fish Early Life Stage (Freshwater):** MRID 49342708 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ¹³ **850.1400 – Fish Early Life Stage (Saltwater):** MRID 49342708 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.

- ¹⁴ **850.1500 – Life Cycle Fish:** The study cited is classified as supplemental and satisfies the requirement per the Problem Formulation.
- ¹⁵ **850.1710, 850.1730, 850.1850 - Aquatic Organisms Bioavailability, Biomagnification, Toxicity:** The studies cited were classified as acceptable and satisfy the requirement per the Problem Formulation.
- ¹⁶ **850.1735 – Whole Sediment: Acute Freshwater Invertebrates:** MRIDs 49342709 and 49524602 appear to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ¹⁷ **850.1740 – Whole Sediment: Acute Marine Invertebrates:** MRID 49524603 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ¹⁸ **SS-1172 – Wood Leaching Study (AWPA E11-06):** The studies cited appear to have been submitted as required in the Registration Review.
- ¹⁹ **850.1950 – Simulated or Actual Field Testing for Aquatic Organisms:** This study was not reviewed in the Problem Formulation or required in the Generic DCI but appears to meet the guideline requirement.
- ²⁰ **850.3020 – Honey Bee Acute Contact Toxicity:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ²¹ **850.6200 – Acute Neurotoxicity- Rat:** MRIDs 49342714 and 4932715 appear to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ²² **870.3100 – 90-Day Oral: Rodent:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Decision.
- ²³ **870.3150 – 90-Day Oral: Non-Rodent:** The study cited has been classified as acceptable and satisfies the requirement per the Re-Registration Eligibility Decision.
- ²⁴ **870.3200 – 21/28 Day Dermal Toxicity:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Decision.
- ²⁵ **870.3250 – 90-Day Dermal Toxicity:** The study cited has been classified as acceptable and satisfies the requirement per the Re-Registration Eligibility Decision.
- ²⁶ **870.3465 – 90-Day Inhalation Study:** MRIDs 49184810 and 49247501 appear to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers the first study as they are part of the chlorothalonil collaboration paying for registration review studies. The letter of authorization does not cover the second study and thus an offer to pay has been extended.
- ²⁷ **870.4100 – Chronic Oral Rat:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Decision.
- ²⁸ **870.4300 – Combined Chronic Toxicity/Carcinogenicity:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Decision.

- ²⁹ **870.3700 – Prenatal Development Toxicity Study:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Decision.
- ³⁰ **870.3800 – Reproduction and Fertility Effects:** The study cited has been classified as acceptable and satisfies the requirement per the Re-Registration Eligibility Decision.
- ³¹ **870.5100, 870.5300, 870.5375, 870.5385, 870.5395 – Mutagenicity Testing:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Document.
- ³² **870.7600 – Dermal Penetration:** The study cited has been classified as acceptable and satisfies the requirement per the Re-Registration Eligibility Decision.
- ³³ **870.7800 – Immunotoxicity:** MRID 48796201 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ³⁴ **870.7485 – Metabolism and Pharmacokinetics:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Document.
- ³⁵ **875.1300 – Inhalation Exposure – Outdoor:** MRIDs 49184801, 49184803 and 49184804 appear to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers the first study as they are part of the chlorothalonil collaboration paying for registration review studies. The letter of authorization does not cover the second study and thus an offer to pay has been extended.
- ³⁶ **875.1400 – Inhalation Exposure – Indoor:** MRIDs 49184801, 49184803 and 49184804 appear to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers the first study as they are part of the chlorothalonil collaboration paying for registration review studies. The letter of authorization does not cover the second study and thus an offer to pay has been extended.
- ³⁷ **875.2100 – Dislodgeable Foliar Residue and Turf Transferable Residues:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Decision.
- ³⁸ **875.2200 – Soil Residue Dissipation:** The studies cited have been classified as acceptable and satisfy the requirement per the Re-Registration Eligibility Decision.
- ³⁹ **875.2300 – Indoor Surface Residue Dissipation:** This study was required in the Registration Review DCI but no study has been submitted.
- ⁴⁰ **202-1 – Droplet Size Spectrum:** MRID 49184805 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ⁴¹ **202 – Droplet Size Spectrum:** MRID 49184806 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ⁴² **850.4100 – Tier I: Seedling Emergence:** The study cited (MRID 42433808) was classified as acceptable and partially satisfies the data requirement per the Problem Formulation. MRID 49342711 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ⁴³ **850.4150 – Tier I: Vegetative Vigor:** The study cited (MRID 42433809) was classified as acceptable and partially satisfies the data requirement per the Problem Formulation. MRID 49342712 appears to

have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.

- ⁴⁴ **850.4400 – Tier I: Aquatic Plant Growth – Vascular Plants:** The study cited has been classified as acceptable and satisfies the requirement per the Problem Formulation.
- ⁴⁵ **850.5400 – Tier I & 2: Aquatic Plant Growth – Algae:** The studies cited have been classified as acceptable and satisfy the requirement per the Problem Formulation.
- ⁴⁶ **850.3300 – Modified Activated Sludge Respiration Inhibition Test:** It appears that MRID 49527202 was submitted to satisfy the Registration Review data requirement in lieu of 850.6800.
- ⁴⁷ **850.6100 – Environmental Chemistry Methods:** MRIDs 49659702 and 49659704 appear to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers the first study as they are part of the chlorothalonil collaboration paying for registration review studies. The letter of authorization does not cover the second study and thus an offer to pay has been extended.
- ⁴⁸ **850.6800 – Modified Activated Sludge Respiration Inhibition:** It appears that in lieu of this test guideline, data was submitted for the Registration Review DCI under 850.3300.
- ⁴⁹ **835.1100 – Activated Sludge, Sorption, Isotherm:** The study cited appears to have been submitted in response to the Registration Review DCI.
- ⁵⁰ **835.2120 – Hydrolysis:** The study cited (MRID 00040539) was classified as supplemental and partially satisfies the data requirement per the Problem Formulation. MRID 49342701 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ⁵¹ **835.2240 – Photodegradation in Water:** MRID 49342702 appears to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ⁵² **835.2370 – Photodegradation in Air:** This study was required in the Registration Review DCI but no study has been submitted.
- ⁵³ **835.2410 – Photodegradation in Soil:** The studies cited have been classified as supplemental and satisfy the requirement per the Problem Formulation.
- ⁵⁴ **835.3110 – Ready Biodegradability:** The studies cited appear to have been submitted in response to the Registration Review DCI.
- ⁵⁵ **835.3220 – Porous Pot Test:** This study was required in the Registration Review DCI but no study has been submitted.
- ⁵⁶ **835.3240 – Simulation Tests – Aerobic Sewage Treatment – Activated Sludge:** This study was required in the Registration Review DCI but no study has been submitted.
- ⁵⁷ **835.3280 – Simulation Tests to Assess the Biodegradability of Chemicals:** This study was required in the Registration Review DCI but no study has been submitted.

- ⁵⁸ **835.4100 – Aerobic Soil Metabolism:** MRIDs 00087357, 00040547, 43879601, 47207702, and 47207703 were classified as supplemental and partially satisfy the data requirement. MRIDs 49592601 and 49592602 appear to have been submitted in response to the Registration Review DCI.
- ⁵⁹ **835.4200 – Anaerobic Soil Metabolism:** The cited study appears to have been submitted in response to the Registration Review DCI.
- ⁶⁰ **835.4300 – Aerobic Aquatic Metabolism:** MRIDs 42226101, 45908001 and 47207707 were classified as supplemental and partially satisfy the data requirement. MRID 49592604 appears to have been submitted in response to the Registration Review DCI.
- ⁶¹ **835.4400 – Anaerobic Aquatic Metabolism:** MRID 00147975 was classified as supplemental and partially satisfies the data requirement. MRID 49592604 appears to have been submitted in response to the Registration Review DCI.
- ⁶² **835.1230, 835.2140 – Leaching/Adsorption/Desorption:** The study cited (MRID 00029406) was classified as supplemental and partially satisfies the data requirement per the Problem Formulation. MRIDs 49342703 - 49342706 appear to have been submitted in response to the Registration Review DCI. The letter of authorization from ADAMA Celsius Property B.V. covers this study as they are part of the chlorothalonil collaboration paying for registration review studies.
- ⁶³ **835.8100 – Volatility – Field:** The cited study appears to have been submitted in response to the Registration Review DCI.
- ⁶⁴ **835.6100 – Soil Field Dissipation Study:** The cited studies have been classified as supplemental and partially satisfy the guideline requirement. MRID 49992901 appears to have been submitted in response to the Registration Review DCI.
- ⁶⁵ **835.6200 – Aquatic Sediment Field Dissipation Study:** The study cited was classified as acceptable and satisfies the requirement per the Problem Formulation.
- ⁶⁶ **890.1100, 890.1150, 890.1350, 890.1400, 890.1450, 890.1500, 890.1550, 890.1600 – Endocrine Disruption Studies:** The letter of authorization from ADAMA Celsius Property B.V. covers these studies as they are part of the chlorothalonil collaboration paying for the endocrine disruption studies.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
 Control Solutions, Inc., 5903 Genoa Red Bluff, Pasadena, TX 77507

EPA Registration Number/File Symbol
 53883-URR

Active Ingredient(s) and/or representative test compound(s)
 Chlorothalonil

Date
 June 9, 2017

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
 Terrestrial Non-Food, Greenhouse non-food, Residential Outdoor, Residential Indoor

Product Name
 CSI Chlorothalonil Technical NC

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Leanna Bosarge

Date

June 9, 2017

Typed or Printed Name and Title

Leanna Bosarge - Director, Regulatory Affairs



March 22, 2017

Mr. Tony Kish, PM Team 22
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

RE: Letter of Authorization for Chlorothalonil Technical – Non-Crop Uses Only

Dear Mr. Tony Kish,

Makhteshim Agan of North America Inc. (d/b/a ADAMA), the authorized agent of ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558), is issuing this letter to support Control Solutions, Inc. (EPA Company No. 53883) and the submission of a new product registration for Chlorothalonil Technical for non-crop uses only under the EPA Number 53883-XXX. Data to support this new registration is cited from Chlorothalonil Technical (EPA Reg. No. 83558-19).

This authorization to the US EPA to consider our data is extended solely in connection with registration purposes for non-crop uses as agreed upon by ADAMA Celsius and access is limited to Agency employees. A list of the studies to support this new registration is found in Attachment 1.

This authorization is granted only to Control Solutions, Inc. for the submission of a new non-crop only Chlorothalonil Technical registration.

This authorization is not to be extended or transferred to any other applicant unless stipulated in writing by ADAMA Celsius.

This authorization is not to be construed as an authorization to use said data directly or indirectly in support of any subsequent registration application without the express written consent by ADAMA Celsius.

Should you have any questions or comments pertaining to this submission, please feel free to contact me via email at karina.castro@adama.com or via phone at (919) 256-9322.

Sincerely,

Karina Castro
Federal Regulatory Manager

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com



ATTACHMENT 1

ADAMA Celsius Property B.V., Amsterdam (NL) (EPA Company No. 83558) list of studies to support Control Solutions, Inc. (EPA Company No. 53883)

Submission of a New Product Registration for Chlorothalonil Technical for Non-Crop Uses Only Under the EPA Number 53883-XXX.

ADAMA

ADAMA | 3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604
Telephone +1 919 256 9300 | Facsimile +1 919 256 9308 | www.adama.com

- 49184807 Doyle-Eisele, M.; McDonald, J. (2013) Chlorothalonil: Chlorothalonil - Range Finding Study: Single Nose-Only Inhalation Exposure in Male and Female Sprague Dawley Rats: Final Report Amendment 2. Project Number: FY12/035, TK0118157. Unpublished study prepared by Lovelace Foundation for Medical Education. 1159p.
- 49184808 Doyle-Eisele, M.; McDonald, J. (2013) Chlorothalonil - Single Dose Tolerability Study by Nose-Only Inhalation in Male and Female Sprague Dawley Rats: Final Report Amendment 2. Project Number: FY12/034, TK0114394. Unpublished study prepared by Lovelace Foundation for Medical Education. 507p.
- 49184809 Doyle-Eisele, M.; Garner, II, C. (2013) (Carbon 14)-Chlorothalonil - Single Dose Pilot Toxicokinetic Study by Nose-Only Inhalation in Male Sprague Dawley Rats: Final Report Amendment 2. Project Number: FY12/055, TK0114395. Unpublished study prepared by Lovelace Foundation for Medical Education. 135p.
- 49184810 Bain, J. (2013) Chlorothalonil: Chlorothalonil - (Bravo WatherStik 720 SC) (A1231B): 2 Week Inhalation Toxicity Study in Rats with up to 14 Days Recovery: Audited Draft Report V1.3. Project Number: 34453, 672851, TK0177757. Unpublished study prepared by Charles River Laboratories. 346p.
- 49226001 Lee, M. (2013) Chlorothalonil - Amphibian Metamorphosis Assay with African Clawed Frog (*Xenopus laevis*): Final Report Amendment 1. Project Number: TK0002372, 1781/6774. Unpublished study prepared by Smithers Viscient Laboratories. 151p.
- 49342701 Wicksted, G.; Andrews, S.; Cleland, H. (2014) Chlorothalonil - Hydrolysis of [(Carbon 14)]-Chlorothalonil: Final Report. Project Number: 32995, 810542, TK0046546. Unpublished study prepared by Charles River Laboratories. 170p.
- 49342702 Jewkes, Y. (2014) Chlorothalonil - Aqueous Photolysis of [(Carbon 14)]-Chlorothalonil: Final Report. Project Number: 34841, 810722, TK0046545. Unpublished study prepared by Charles River Laboratories. 124p.
- 49342703 Blair, L. (2014) R471811 - Adsorption/Desorption Properties in Five Soils: Final Report. Project Number: 34864, 222248, TK0046552. Unpublished study prepared by Charles River Laboratories. --
- 49342704 Blair, L. (2014) R419492 - Adsorption/Desorption Properties in Five Soils: Final Report. Project Number: 35019, 222232, TK0046551. Unpublished study prepared by Charles River Laboratories. 65p.
- 49342705 Blair, L. (2014) R613636 - Adsorption/Desorption Properties in Five Soils: Final Report. Project Number: 35043, 222269, TK0046550. Unpublished study prepared by Charles River Laboratories. 88p.
- 49342706 Ferguson, H.; Atkinson, K. (2014) Chlorothalonil - Adsorption/Desorption Properties in Five Soils: Final Report. Project Number: 33294, 219479, TK0046547. Unpublished study prepared by Charles River Laboratories. 85p.
- 49342707 Fournier, A. (2013) Chlorothalonil - Acute Toxicity of Sheepshead Minnow (*Cyprinodon variegatus*) Under Static-Renewal Conditions: Final Report. Project Number: 1781/6915, TK0172618, 10529207. Unpublished study prepared by Smithers Viscient Laboratories. 40p.
- 49342708 Schwader, A. (2014) Chlorothalonil - Early Life-Stage Toxicity Test with Sheepshead Minnow (*Cyprinodon variegatus*): Final Report. Project Number: 1781/6917, TK0172621, 10529207. Unpublished study prepared by Smithers Viscient Laboratories. 56p.
- 49342709 Bradley, M. (2014) 10-Day Toxicity Test Exposing Freshwater Amphipods (*Hyaella azteca*) to Chlorothalonil Applied to Sediment Under Static-Renewal Conditions: Final Report. Project Number: 1781/6940, TK0180598, 10529207. Unpublished study prepared by Smithers Viscient Laboratories. 65p.
- 49342710 Hubbard, P.; Beavers, J. (2013) Chlorothalonil - An Acute Oral Toxicity Study with the Zebra Finch Using a Sequential Testing Procedure: Final Report. Project Number: 528/412, TK0172620, TK0180808. Unpublished study prepared by Wildlife International, Ltd. 67p.
- 49342711 Martin, J. (2014) Chlorothalonil SC (A12531B) - Seedling Emergence Test: Final Report. Project Number: 1781/6921, TK0172626, 10529207. Unpublished study prepared by Smithers Viscient Laboratories. 303p.

- 49342712 Martin, J. (2014) Chlorothalonil SC (A12531B) - Vegetative Vigor Test: Final Report. Project Number: 1781/6920, TK0172624, 10521561. Unpublished study prepared by Smithers Viscient Laboratories. 310p.
- 49342713 Perez, R.; Tarkalanov, N. (2014) Chlorothalonil - Multi Residue Method Testing for Metabolite SDS 3701 in Crops: Final Report. Project Number: ADPEN/2K14/0106/SYN, TK0186270. Unpublished study prepared by ADPEN Laboratories, Inc. 135p.
- 49342714 Herberth, M. (2014) Chlorothalonil - An Oral (Gavage) Acute Neurotoxicity Study in Rats: Final Report. Project Number: WIL/639212, TK0139675, TK0180808. Unpublished study prepared by WIL Research Laboratories, Inc. 1093p.
- 49342715 Herberth, M. (2014) Chlorothalonil - An Oral (Gavage) Dose Range-Finding Acute Neurotoxicity Study in Rats: Final Report. Project Number: WIL/639211, TK0136290, WIL/639211J. Unpublished study prepared by WIL Research Laboratories, Inc. 335p.
- 49524601 Schwader, A. (2014) Chlorothalonil - Life-Cycle Toxicity Test with Mysids (*Americamysis bahia*): Final Report. Project Number: 1781/6916, TK0172619. Unpublished study prepared by Smithers Viscient Laboratories. 109p.
- 49524602 Bradley, M. (2014) Chlorothalonil: 10-Day Toxicity Test Exposing Midge (*Chironomus dilutus*) to Chlorothalonil Applied to Sediment Under Static-Renewal Conditions: Final Report. Project Number: 1781/6918, TK0172623. Unpublished study prepared by Smithers Viscient Laboratories. 102p.
- 49524603 Bradley, M (2014) Chlorothalonil: 10-Day Toxicity Test Exposing Estuarine Amphipods (*Leptocheirus plumulosus*) to Chlorothalonil Applied to Sediment Under Static Conditions: Final Report. Project Number: 1781/6919, TK0172625. Unpublished study prepared by Smithers Viscient Laboratories. 91p.
- 49659702 Guo, D. (2015) Chlorothalonil: Chlorothalonil - Independent Laboratory Validation (ILV) of Analytical Method (GRM005.08A) for the Residue Determination of Chlorothalonil in Soil by LC-MS/MS: Final Report. Project Number: PASC/REP/0528, 141/1072, TK0225797. Unpublished study prepared by Primera Analytical Solutions Corporation.
- 49659704 Lin, K.; Huang, S. (2015) Chlorothalonil: Analytical Method (GRM005.08A) for Residue Determination of Chlorothalonil in Soil by LC-MS/MS. Project Number: GRM005/08A, TK0225796. Unpublished study prepared by Syngenta Crop Protection. 55p.
- 50141701 Discussion of Formation of Impurities, Preliminary Analysis, Certified Limits. ADAMA Celsius Property
49876801 B.V.
49876802
- 50141703 Enforcement Analytical Method ADAMA Celsius Property B.V.
49876802
49876801



April 17, 2017

U.S. Environmental Protection Agency
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Attn: Mr. Tony Kish

**RE: R310 Application for a Chlorothalonil Technical Product Using Currently Registered Sources
53883-NEW CSI Chlorothalonil Technical NC**

Dear Mr. Kish,

Control Solutions, Inc. wishes to apply for a new technical registration of chlorothalonil. This product is substantially similar in labeling and identical in composition to 83558-19. In support of this application, included please find:

Administrative Materials

- Application for Pesticide Registration (EPA Form 8570-1)
- Confidential Statement of Formula – Basic and Alternate #1 (EPA Form 8570-4)
- Certification with Respect to Citation of Data (EPA Form 8570-34)
- Data Matrix (EPA Form 8570-35), Public and Agency Versions
- Proposed Label for CSI Chlorothalonil Technical NC
- Copy of the PRIA Payment Receipt for an R310 Application
- Letter of Authorization from ADAMA Celsius Property B.V. (EPA Company No. 83558)

Control Solutions, Inc. is using the straight selective method of data citation. As per EPA's interpretations of 40 CFR Parts 152.93(b)(2)(i), Control Solutions, Inc. submitted notices of intent to apply and offer to pay to the extent required by FIFRA § 3(c)(1)(F). This action falls under PRIA category R310 (46: New end-use or manufacturing-use product with registered source(s) of active ingredient(s); selective data citation). The fee for this action is \$5,301 and has been paid.

Please feel free to contact me by email at leanna.bosarge@controlsolutionsinc.com or by phone at 281-892-2512 should you have any questions regarding this submission or need any additional information.

Sincerely,

Leanna Bosarge
Director, Regulatory Affairs

	United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001	<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section I

1. Company/Product Number 53883-XXX	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) CSI Chlorothalonil Technical NC	PM # 22	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: EPA Reg. No.: 83558-19 Product Name: Chlorothalonil Technical

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input checked="" type="checkbox"/> Other – Explain below.

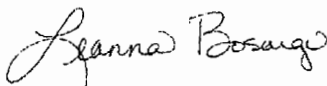
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

New registration application for a chlorothalonil technical product utilizing previously approved sources with selective citation of data.

Section – III

1. Material This Product Will Be Packaged In:					
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____		
* Certification must be submitted		If "Yes" Unit Packaging Wt.	No. Per Container	If "Yes" Packaging Wt.	No. Per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2000 lbs		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).			
Name Leanna Bosarge	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (281) 892-2512	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Director, Regulatory Affairs	
4. Typed Name Leanna Bosarge		5. Date April 17, 2017	